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May 9, 2025

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
Frank Lautenberg Post Office & U.S. Courthouse
2 Federal Plaza, 3rd Floor
Newark, New Jersey 07102

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080

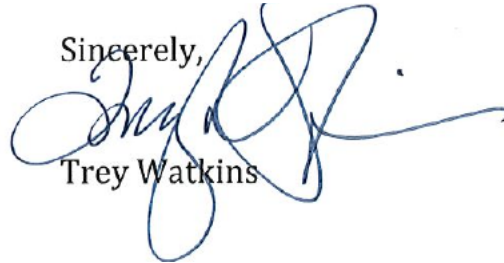
Dear Judge Martinotti:

On May 2, 2025, the State Attorney General Track filed its Memorandum on Issue of Constructive Notice [ECF 538]. Puerto Rico was inadvertently omitted from that filing. We respectfully ask the Court to consider the following with regard to Puerto Rico and the Attorney General Track filing:

Defendants filed Motions to Dismiss the Government of Puerto Rico's ("Government") action while the case was pending in Puerto Rico state court. Defendants did not move to renew their Motions in the District of Puerto Rico or this Court. Constructive notice was not at issue in the briefings on the Motions. To the extent the Court believes constructive notice is nonetheless relevant to the Government's action, the Government hereby adopts the arguments discussed in the State Attorney General Track's Memorandum on Issue of Constructive Notice, Dkt. No. 538.

If the foregoing request is acceptable to Your Honor, we respectfully request that this letter be "So Ordered" and entered on the docket. Thank you for your time and attention.

Sincerely,



Trey Watkins

cc: All Counsel of Record (via ECF)